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AT&T Mobility LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

BARRY HALL, *et al.*,

Plaintiffs,

v.

AT&T MOBILITY LLC f/k/a CINGULAR  
WIRELESS LLC, *et al.*,

Defendants.

Civil Action No. 07-05325 (JLL)

**DECLARATION OF TIFFANEY A. ALLEN**

I, TIFFANEY A. ALLEN, declare and say as follows:

1. I am a Senior Vice President with Rust Consulting, Inc. ("Rust Consulting"). My business address is 625 Marquette Avenue, Suite 880, Minneapolis, Minnesota 55402. My telephone number is 612-359-2047. I am over twenty-one years of age and authorized to make this declaration on behalf of Rust Consulting. Except as otherwise stated, I am fully familiar with and have personal knowledge of the matters in this declaration and am competent to testify about them if called upon to do so.

2. Rust Consulting is the Settlement Administrator for the AT&T Mobility settlement

DECLARATION OF TIFFANEY A. ALLEN  
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1 in the above-captioned action. Unless otherwise defined in my declaration, capitalized terms in my  
2 declaration have the meaning defined in the parties' Settlement Agreement.

3 3. Rust Consulting specializes in class action administration, its services including class  
4 data management and processing, developing and administering class notification plans and  
5 notification campaigns, developing and running settlement claims processes, including website  
6 hosting, call center services, claims processing and distribution, and reporting to courts regarding  
7 the claims process. Rust Consulting has extensive experience in class action matters, having  
8 provided case administration services in a variety of class actions, including those involving  
9 antitrust, securities fraud, property damage, employment discrimination, product liability, insurance  
10 and consumer and/or telecommunications issues. Combined, we have provided services in more  
11 than 2,500 matters.  
12

13  
14 4. As a Senior Vice President of Rust Consulting, I personally have been involved in  
15 over 200 cases. I have been involved in claims administration for more than 14 years and have  
16 significant experience overseeing the development of class notification plans, including the  
17 promulgation and dissemination of notice as well as developing and directing all aspects of claims  
18 administration programs. In this case, my responsibilities as settlement administrator have  
19 included, among other things, working with counsel for the parties in developing and designing the  
20 settlement's notice plan and creating and overseeing the claims administration process.  
21

22 5. Notice of the settlement in the above-caption action was provided to potential class  
23 members through Mail Notice, Invoice Notice, Publication Notice, and through a settlement  
24 website. Rust Consulting reviewed or caused the Mail Notice, Invoice Notice, and Publication  
25 Notice to be reviewed as part of the settlement process to ensure that they were written in plain  
26 language and communicated the necessary information to advise a potential class member of his  
27 rights and options.  
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DECLARATION OF TIFFANEY A. ALLEN  
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1           6.       Following preliminary approval of the settlement, Rust Consulting mailed the Mail  
2 Notice, published the Publication Notice, and established and maintained the settlement website, as  
3 discussed in detail in the declaration of my colleague, Joel Botzet, filed with the Court on May 28,  
4 2010. AT&T Mobility issued the Invoice Notice, as discussed in the declaration of John T.  
5 Throckmorton, also filed with the Court on May 28, 2010.

6  
7           7.       Rust Consulting mailed the Mail Notice to all individuals on the ETF Payer Class  
8 Member List, which included class members residing at addresses throughout the United States,  
9 including Puerto Rico.

10           8.       In addition to my experience and expertise as discussed above, I am also familiar  
11 with the notice programs associated with the settlements of *Milliron v. T-Mobile USA, Inc.*, No. 08-  
12 04149 (D.N.J.) (the “T-Mobile ETF settlement”), and *Larson v. Sprint Nextel Corp.*, No. 07-5325  
13 (D.N.J.) (the “Sprint ETF settlement”), both of which received final approval from this Court. Rust  
14 Consulting is the settlement administrator for the T-Mobile ETF Settlement.

15  
16           9.       Based upon my experience, the notice program for the ATTM settlement is  
17 appropriate and comparable to notice programs for other similar class action settlements, including  
18 the settlements in the Sprint and T-Mobile ETF cases which received final approval from this Court.

19  
20           10.      In approving the Sprint ETF Settlement notice plan, the Court found that a  
21 publication plan with a reach in the 49-53% range, coupled with a strong individual notice program,  
22 was adequate and sufficient, *Larson v. Sprint Nextel Corporation*, 2010 WL 234934, \*6 (D.N.J.  
23 2009). In comparison to the Sprint notice plan, the AT&T Mobility settlement publication plan is  
24 similar with a more extensive individual notice program. The AT&T Mobility individual notice  
25 program is more extensive than the Sprint ETF settlement because AT&T Mobility has utilized data  
26 from its billing systems in creating the ETF Payer Class Member List.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 9<sup>th</sup> day of June 2010, at Minneapolis, Minnesota.

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